

1 JAMES S. THOMSON
California SBN 79658
2 Attorney and Counselor at Law
819 Delaware Street
3 Berkeley, California 94710
Telephone: (510) 525-9123
4 Facsimile: (510) 525-9124
james@ycbtal.net
5
6 Attorney for Defendant
Kenneth Fleming, Jr.

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 UNITED STATES OF AMERICA,)
13)

14 Plaintiff,)

15 vs.)

16 KENNETH FLEMING, JR.,)

17 Defendants.)
18)
19 _____)

Case No. 4:15-cr-00290 PJH

**STIPULATION AND ~~[PROPOSED]~~
ORDER RE MODIFICATION OF
RELEASE CONDITIONS TO PERMIT
TRAVEL**

Judge: Hon. Phyllis J. Hamilton

20 The parties hereby stipulate and agree that:

21 1. Defendant Kenneth Fleming's conditions of release provide that he may not travel
22 outside the Northern District of California.

23 2. Mr. Fleming wishes to travel to 3500 Data Drive, Rancho Cordova, California
24 95670, leaving the early morning of November 13, 2015 and returning the evening of November
25 16, 2015, in order to visit his brother and nephew, Bryant Fleming and Bryant Fleming, Jr.

26 3. Mr. Fleming wishes to travel to 3500 Data Drive, Rancho Cordova, California
27 95670, leaving the early morning of November 26, 2015 and returning the evening of November
28 30, 2015, in order to visit his brother and nephew, Bryant Fleming and Bryant Fleming, Jr.

1 4. United States Pretrial Services Officer Victoria Gibson has no objection to
2 these requests.

3 5. Assistant United States Attorney Garth Hire has no objection to these requests.

4 6. Mr. Fleming will provide an itinerary to Officer Gibson in advance of his travel.
5

6 IT IS SO STIPULATED
7

8 DATED: November 6, 2015

Respectfully submitted,

9 */s/ James Thomson*

10 _____
JAMES THOMSON
Attorney for Kenneth Fleming, Jr.
11

12 DATED: November 6, 2015

13 _____
/s/
GARTH HIRE
Assistant United States Attorney
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KENNETH FLEMING, JR.,

Defendants.

Case No. 4:15-cr-00290 PJH

~~PROPOSED~~ ORDER RE
MODIFICATION OF RELEASE
CONDITIONS TO PERMIT TRAVEL

Judge: Hon. Phyllis J. Hamilton

Good cause having been shown, the parties' Stipulation and [Proposed] Order re Modification of Release Conditions to Permit Defendant Kenneth Fleming to travel to: (1) 3500 Data Drive, Rancho Cordova, California 95670, leaving the early morning of November 13, 2015 and returning the evening of November 16, 2015, in order to visit his brother and nephew, Bryant Fleming and Bryant Fleming, Jr.; and (2) 3500 Data Drive, Rancho Cordova, California 95670, leaving the early morning of November 26, 2015 and returning the evening of November 30, 2015, in order to visit his brother and nephew, Bryant Fleming and Bryant Fleming, Jr. is hereby GRANTED.

IT IS SO ORDERED.

Dated: 11/6/15


KANDIS A. WESTMORE
United States Magistrate Judge